

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

_____)	CIVIL ACTION NO. 05-30202-MAP
THE WOLFINGTON GROUP,)	
)	
Plaintiff,)	
)	
V.)	
)	
BERTERA CHEVROLET, PONTIAC,)	
BUICK, INC.,)	
)	
Defendant.)	
_____)	

**DEFENDANT, BERTERA CHEVROLET, PONTIAC, BUICK, INC.’S MOTION FOR
LEAVE TO AMEND ITS ANSWER TO AMEND ITS RESPONSE TO PARAGRAPH 18
OF THE PLAINTIFF’S COMPLAINT**

NOW COMES the Defendant, Bertera Chevrolet, Pontiac, Buick, Inc. (“Bertera”), by and through its attorney, John A. Kiernan, and hereby moves, pursuant to F.R.C.P. (15)(a), to amend its Answer to the Plaintiff’s Complaint to amend its response to paragraph 18. As grounds in support hereof, the Defendant states that the Plaintiff will not suffer any prejudice as a result of the amendment. In further support thereof, Bertera hereby incorporates by reference the attached Memorandum of Law as if expressly re-written herein.

WHEREFORE, the Defendant, Bertera Chevrolet, Pontiac, Buick, Inc. respectfully requests that this Court grant it leave to amend its answer to amend its response to paragraph 18 of the Plaintiff’s Complaint.

**BERTERA CHEVROLET, PONTIAC,
BUICK, INC.**

By its attorney,

s/John A. Kiernan

John A. Kiernan, (BBO No. 271020)

Bonner, Kiernan, Trebach & Crociata, LLP

One Liberty Square, 6th Floor

Boston, MA 02109